

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
Plaintiff,

**NOTICE OF MOTION
TO FILE UNDER SEAL**

v.

Case No: 15-CR-149

FRANK R. PARLATO, JR.,
CHITRA SELVARAJ,
Defendants.

STATE OF NEW YORK)
COUNTY OF ERIE) ss:
CITY OF BUFFALO)

JUSTIN D. GINTER, ESQ., being duly sworn, deposes and says:

1. I, along with Paul J. Cambria, Jr., Esq. and Herbert L. Greenman, Esq. represent the defendant Frank Parlato, Jr. Joel L. Daniels, Esq. represents the defendant Chitra Selvaraj.

2. Your deponent requests that the defendants' Objections to the Report and Recommendation issued by United States Magistrate Judge Jeremiah J. McCarthy be filed under seal because the information set forth therein deals with issues in the case that should not be made available to the public.

WHEREFORE, your deponent prays that this Court rule accordingly.

DATED: Buffalo, New York
March 7, 2017

Respectfully submitted,

/s/Justin D. Ginter
JUSTIN D. GINTER, ESQ.

PAUL J. CAMBRIA, JR., ESQ.
HERBERT L. GREENMAN, ESQ.
JUSTIN D. GINTER, ESQ.
LIPSITZ GREEN SCIME CAMBRIA LLP
Attorneys for Defendant
FRANK PARLATO, JR.

Office and Post Office Address
42 Delaware Avenue, Suite 120
Buffalo, New York 14202
(716) 849-1333
pcambria@lglaw.com
jginter@lglaw.com

Subscribed and sworn to before
me this
7th day of March, 2017.

/s/Kristina Drewery
Commissioner of Deeds
Qualified in Erie County
My Commission Expires
December 31, 2018

TO: ELIZABETH MOELLERING, ESQ.
JOHN D. FABIAN, ESQ.
ASSISTANT UNITED STATES ATTORNEYS
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

Case No: 15-CR-00149

v.

FRANK R. PARLATO, and
CHITRA SELVARAJ,

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2017, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system.

I hereby certify that on March 7, 2017, a copy of the foregoing was also delivered to the following via CM/ECF.

TO: ELIZABETH R. MOELLERING, ESQ.
JOHN D. FABIAN, ESQ.
ASSISTANT UNITED STATES ATTORNEYS
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202

Dated: March 7, 2017

s/Amanda Workman

Amanda Workman